

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

**NICOLE P. ERAMO,**

**Plaintiff,**

**v.**

**ROLLING STONE LLC,  
SABRINA RUBIN ERDELY, and  
WENNER MEDIA LLC,**

**Defendants.**

**Case No. 3:15-cv-00023-GEC**

**JOINT MOTION FOR VOLUNTARY DISMISSAL PURSUANT TO RULE 41(a)(2)**

Pursuant to Fed. R. Civ. P. 41(a)(2), Plaintiff hereby moves the Court for an order effecting a voluntary dismissal of this action with prejudice, each party to bear its own costs and fees. Counsel for Defendants consents to and joins in this Motion. As a term of the dismissal order, Plaintiff respectfully requests that the Court retain jurisdiction over the action in order to issue a decision on her pending October 17, 2016 Motion for Reconsideration of the Court's October 11, 2016 Order Granting Defendants' Emergency Motion for Injunctive Relief and Sanctions [Dkt. 288]. Defendants have represented that they do not object to this request.

Dated: April 11, 2017

Respectfully submitted,

/s/ Thomas A. Clare

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